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May 6, 2022

VIA ECF AND EMAIL

Special Master Thomas P. Scrivo, Esq.
O'Toole Scrivo, LLC
14 Village Park Road
Cedar Grove, NJ 07009

tscrivo@oslaw.com

RE: *Occidental Chemical Corp. v. 21st Century Fox America, Inc., et al.*
Docket No. 2:18-cv-11273-MCA-LDW

Dear Special Master Scrivo:

The Small Parties Group ("SPG") writes in follow-up to its May 2, 2022 letter regarding Occidental Chemical Corporation's ("OxyChem") Motion for Reconsideration and Clarification of the April 19, 2022 Order of Special Master Granting in Part and Denying in Part the SPG's Motion to Compel (ECF No. 2037) ("Motion"). As stated in that letter, the SPG conferred with OxyChem regarding a proposed deadline and page-limit for the SPG's response to the Motion. OxyChem agreed to a deadline of May 27, 2022 and a 20-page limit for the SPG's response.

The SPG respectfully requests that the Special Master adopt the parties' proposal and impose a deadline of May 27, 2022 and a 20-page limit for the SPG's response to the Motion.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Talbert", with a long horizontal flourish extending to the right.

Jeffrey Talbert

cc: All counsel of record